

# **EXHIBIT 6**

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1                   IN THE UNITED STATES DISTRICT COURT  
2                   NORTHERN DISTRICT OF OHIO  
3                   EASTERN DIVISION

4  
5  
6                   IN RE: NATIONAL PRESCRIPTION      MDL No. 2804  
7                   OPIATE LITIGATION    Case No. 17-md-2804  
8    Judge Dan Aaron  
9                   This document relates to:    Polster

10                   The County of Cuyahoga v. Purdue  
11                   Pharma L.P., et al.  
12                   Case No. 18-OP-45090  
13                   City of Cleveland, Ohio v. Purdue  
14                   Pharma L.P., et al  
15                   Case No. 18-OP-45132  
16                   The County of Summit, Ohio, et al.  
17                   v. Purdue Pharma L.P., et al.  
18                   Case No. 17-OP-45004

19  
20    ~~~~~  
21    Volume II  
22    Continued deposition of  
23    LORI BAKER-STELLA

24  
25    May 23, 2019  
26    10:40 a.m.

27  
28    Taken at:  
29    Ulmer & Berne  
30    1660 W. 2nd Street, Suite 1100  
31    Cleveland, Ohio  
32  
33    Renee L. Pellegrino, RPR, CLR

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1 to do?

2 MR. BENNETT: Objection. Vague.

3 You can answer.

4 A. It's not difficult to do, but we  
5 have special investigative tools of how to get  
6 that information.

7 Q. And those tools, without getting  
8 into what they are, apparently they take a while  
9 to implement and apply and think about and  
10 figure out whether they're giving you the  
11 conclusion it's medical judgment versus  
12 non-medical judgment?

13 MR. BENNETT: Objection. Form.

14 You can answer.

15 A. Yes.

16 Q. And at some level it requires the  
17 input of a medical expert?

18 MR. LEDLIE: Object to the form.

19 MR. BENNETT: Objection. Scope.

20 You can answer.

21 A. Yes.

22 Q. Have you worked on investigations at  
23 TDS that are outside the state of Ohio?

24 MR. BENNETT: Objection. Scope.

25 You can answer that question yes or

1 no only.

2 A. Yes.

3 Q. How frequently does that occur?

4 MR. BENNETT: You can answer that.

5 A. Recently it's been just within, but,  
6 you know, we have had it happen but not anything  
7 like most recent.

8 Q. So like today the cases you're  
9 working on are all within Ohio?

10 MR. BENNETT: Objection. Scope.

11 If you can answer that question yes  
12 or no only. And, also, objection, vague.

13 A. As I say, we have a lot of cases, so  
14 I'm trying to -- I'm trying to think. I think  
15 there's a few still outside.

16 Q. Have you ever concluded that a  
17 doctor was overprescribing based solely on  
18 looking at how many prescriptions the doctor was  
19 writing?

20 MR. BENNETT: Objection. Scope.

21 You can answer that question.

22 THE WITNESS: We might get into  
23 technique.

24 MR. BENNETT: You can answer that  
25 question yes or no only. You are authorized to

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1 answer that question yes or no only if you can.

2 A. That is a tool that we use. That's  
3 only one -- that's not one thing that I would  
4 just focus in and say we're taking him.

5 Q. And my question is, the number of  
6 prescriptions alone isn't sufficient to reach a  
7 judgment about whether there's overprescribing  
8 or not?

9 MR. LEDLIE: Object to the form.

10 Q. Do you agree with that?

11 MR. BENNETT: Objection. Scope.

12 You can answer yes or no only.

13 A. Yes.

14 Q. Have you ever requested a search  
15 warrant for a doctor based solely on the amount  
16 of prescriptions that the doctor was writing?

17 MR. BENNETT: You can answer that  
18 question.

19 A. I don't believe I have.

20 - - - - -

21 (Thereupon, Baker-Stella Deposition  
22 Exhibit 7, E-Mail String Dated  
23 December 9, 2016 Bates Numbered  
24 SUMMIT\_001233825, was marked for  
25 purposes of identification.)

1

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2

Q. Detective Baker-Stella, Exhibit 7 is  
an e-mail from you to Joseph Black dated  
December 9th, 2016. It bears the Bates label  
SUMMIT\_001233825.

6

Have you seen this before?

7

A. I remember this e-mail.

8

Q. Who is Joseph Black? Who's Joe  
Black?

10

11

A. Joe Black is a deputy assigned to  
our patrol division.

12

Q. When you say "our patrol division"  
--

14

A. Summit County Sheriff's Office  
patrol division.

16

Q. And in the first sentence he says  
he -- of his e-mail to you, he says, "I have a  
script case that started as an identity theft  
case sent back to me to handle from DB."

20

Do you know what DB stands for?

21

A. Yes. That is our detective bureau.

22

Q. And do you know whether this case  
resulted in a conviction?

24

A. Yes, it did.

25

Q. And who was the person that was